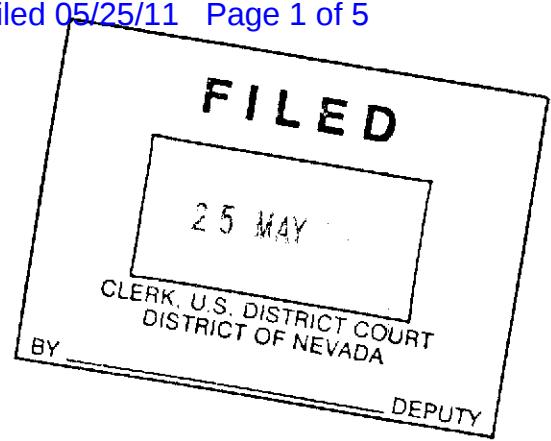


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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

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9
10 UNITED STATES OF AMERICA,) CRIMINAL INDICTMENT
11 PLAINTIFF,) 2:11-cr- 199
12 VS.)
13 SHAWN ANDREWS and) VIOLATIONS:
14 ERIKA GUYTON,) 18 U.S.C. 2423(a) - Transportation of
15 DEFENDANTS.) Minor for Prostitution
16) 18 U.S.C. 1591 - Sex Trafficking of
17) Children
18) 18 U.S.C. 2 - Aiding and Abetting.
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THE GRAND JURY CHARGES THAT:

COUNT ONE

Transportation of Minor for Prostitution

On or about March 25, 2011, in the State and Federal District of Nevada and elsewhere,

**SHAWN ANDREWS and
ERIKA GUYTON,**

defendants herein, knowingly transported an individual, that is, "S," a minor, who was at that time under the age of 18 years, in interstate commerce from California, to Las Vegas, Nevada, with intent that such individual engage in prostitution and sexual activity for which

any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT TWO

On or about March 25, 2011, in the State and Federal District of Nevada and elsewhere,

**SHAWN ANDREWS and
ERIKA GUYTON,**

defendants herein, knowingly transported an individual, that is, "A," a minor, who was at that time under the age of 18 years, in interstate commerce from California, to Las Vegas, Nevada, with intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT THREE

In or about March 2011 or April 2011, in the State and Federal District of Nevada and elsewhere,

**SHAWNY ANDREWS and
ERIKA GUYTON,**

defendants herein, knowingly transported an individual, that is, "S," a minor, who was at that time under the age of 18 years, in interstate commerce from Las Vegas, Nevada, to California, with intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT FOUR

Transportation of Minor for Prostitution

In or about March 2011 or April 2011, in the State and Federal District of

Nevada and elsewhere,

**SHAWNY ANDREWS and
ERIKA GUYTON,**

defendants herein, knowingly transported an individual, that is, "A," a minor, who was at that time under the age of 18 years, in interstate commerce from Las Vegas, Nevada, to California, with intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT FIVE

Transportation of Minor for Prostitution

In or about April 2011, in the State and Federal District of Nevada and elsewhere,

**SHAWNY ANDREWS and
ERIKA GUYTON,**

defendants herein, knowingly transported an individual, that is, "S," a minor, who was at that time under the age of 18 years, in interstate commerce from California to Las Vegas, Nevada, with intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT SIX

Transportation of Minor for Prostitution

In or about April 2011, in the State and Federal District of Nevada and elsewhere,

**SHAWNY ANDREWS and
ERIKA GUYTON.**

defendants herein, knowingly transported an individual, that is, "A," a minor, who was at that time under the age of 18 years, in interstate commerce from California to Las Vegas, Nevada, with intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT SEVEN

In or about April 2011, in the State and Federal District of Nevada and elsewhere,

**SHAWNY ANDREWS and
ERIKA GUYTON,**

defendants herein, knowingly transported an individual, that is, "S," a minor, who was at that time under the age of 18 years, in interstate commerce from California to Las Vegas, Nevada, with intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT EIGHT

Sex Trafficking of Children

Between on or about March 25, 2011, through in or about April 2011, in the State and Federal District of Nevada and elsewhere,

**SHAWNY ANDREWS and
ERIKA GUYTON,**

defendants herein, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate

1 commerce, "S," a minor, knowing that said person would be caused to engage in commercial
2 sex acts, all in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

3 **COUNT NINE**
4 Sex Trafficking of Children

5 Between on or about March 25, 2011, through on or about April 5, 2011, in the
6 State and Federal District of Nevada and elsewhere,

7 **SHAWNY ANDREWS and**
8 **ERIKA GUYTON,**
9 defendants herein, did knowingly, in and affecting interstate commerce, recruit, entice,
10 harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate
commerce, "A," a minor, knowing that said person would be caused to engage in commercial
11 sex acts, all in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

12 DATED: this 25 day of May, 2011.

13 A TRUE BILL:

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